

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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ZENAIDA HERNANDEZ,

Plaintiff,

v.

MARIA E. MONTANEZ, MARK A. VERDINI,  
JONATHAN W. THOMAS, CARLOS M.  
GODEN, JR, and JANE DOE,

Defendants.

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Civil Action No. 12-11062- FDS

**PLAINTIFF'S MOTION TO COMPEL PRODUCTION OF DOCUMENTS AND  
ANSWERS TO INTERROGATORIES**

Pursuant to Rule 37(a) of the Federal Rules of Civil Procedure and Rule 37.1 of the Local Rules of the District of Massachusetts, Plaintiff moves this Court for an order compelling Defendants to provide supplemental responses to Interrogatories 1, 3, 4, and 15, and to produce documents responsive to Requests for Production 2, 6, 7, 8, 9 and 14, within fourteen days of such order.

In support of this Motion, Plaintiff relies on Plaintiff's Memorandum of Law and the Declaration of Drew Glassroth and exhibits attached thereto.

**WHEREFORE**, Plaintiff requests that the Court enter an order directing Defendants to provide supplemental responses to Interrogatories 1, 3, 4, and 15, and to produce documents responsive to Requests for Production 2, 6, 7, 8, 9 and 14, within fourteen days of such order.

RESPECTFULLY SUBMITTED,

For Plaintiff Zenaida Hernandez  
By her attorneys,

/s/ Drew Glassroth

Howard Friedman, BBO #180080

David Milton, BBO #668908

Drew Glassroth, BBO #681725

**Law Offices of Howard Friedman, P.C.**

90 Canal Street, 5<sup>th</sup> Floor

Boston, MA 02114

(617) 742-4100

hfriedman@civil-rights-law.com

dmilton@civil-rights-law.com

dglassroth@civil-rights-law.com

Dated: March 20, 2013

**CERTIFICATE PURSUANT TO LOCAL RULES 7.1 & 37.1,  
AND FEDERAL RULE 37(a)**

I certify that prior to filing this motion Plaintiff's counsel conferred with Defendants' counsel in a good faith effort to resolve or narrow the issues raised herein, and further certify that I have complied with the provisions of Local Rule 37.1. The conferences between counsel are described more fully in Plaintiff's memorandum of law.

Date: March 20, 2013      /s/ Drew Glassroth  
Drew Glassroth

**CERTIFICATE OF SERVICE**

I certify that on this day a true copy of the above document was served upon the attorney of record for each party via ECF.

Date: March 20, 2013      /s/ Drew Glassroth  
Drew Glassroth